UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA SOUTHERN DIVISION

CASE NO.: 00-6026-CIV-FERGUSON/SNOW

WORLDNET COMPANIES. INC.. a Florida Corporation, Plaintiff.

VS.

KLELine, a Limited Company. a corporation incorporated under the laws of France: ABDALLAH HITTI. individually: AYHUB HITTI, individually; BANQUE PARIBAS S.A., a banking corporation incorporated under the laws of France: OCRAM EST., a Liechtenstein corporation: and MICHAEL BENDE, individually, Defendants.

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CLARENCE MADDOX CLERK, USDC/SDFL/FTL

PLAINTIFF'S REPLY TO AFFIRMATIVE DEFENSES **OF DEFENDANT PARIBAS**

COMES NOW. Plaintiff WORLDNET COMPANIES, INC., by and through the undersigned attorneys, and files its reply to the affirmative defenses of the Defendant, PARIBAS, (fka BANQUE PARIBAS, S.A.), and states:

- 1. Plaintiff denies the first affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 2. Plaintiff denies the second affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 3. Plaintiff denies the third affirmative defense of the Defendant Paribas and demands strict proof thereof.
 - 4. Plaintiff denies the fourth affirmative defense of the Defendant Paribas and demands



strict proof thereof.

- 5. Plaintiff denies the fifth affirmative defense of Defendant PARIBAS and demands strict proof thereof.
- 6. Plaintiff denies the sixth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 7. Plaintiff denies the seventh affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 8. Plaintiff denies the eight affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 9. Plaintiff denies the ninth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 10. Plaintiff denies the tenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 11. Plaintiff denies the eleventh affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 12. Plaintiff denies the twelfth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 13. Plaintiff denies the thirteenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 14. Plaintiff denies the fourteenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 15. Plaintiff denies the fifteenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.

- 16. Plaintiff denies the sixteenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 17. Plaintiff denies the seventeenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 18. Plaintiff denies the eighteenth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 19. Plaintiff denies the nineteenth affirmative defense of the Defendant PARIBAS, demands strict proof thereof and affirmatively states that the French action was filed subsequent to the instant case.
- 20. Plaintiff denies the twentieth affirmative of the Defendant PARIBAS and demands strict proof thereof.
- 21. Plaintiff denies the twenty-first affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 22. Plaintiff denies the twenty-second affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 23. Plaintiff denies the twenty-third affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 24. Plaintiff denies the twenty-fourth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 25. Plaintiff denies the twenty-fifth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.
- 26. Plaintiff denies the twenty-sixth affirmative defense of the Defendant PARIBAS and demands strict proof thereof.

I HEREBY CERTIFY that a true copy of the foregoing has been sent this 14th day of

April, 2000, by U.S. Mail to the parties listed on the attached service list.

LAW OFFICES OF JOHN C. RAYSON

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By:

JOHN C. RAYSON

Florida Bar No.: 204153

SERVICE LIST

Worldnet Companies, Inc., vs. KLELine, et. al. Case No.: 00-6026-CIV-FERGUSON

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